

Amy M. Samberg (NV Bar No. 10212)
amy.samberg@clydeco.us
Dylan P. Todd (NV Bar No. 10456)
dylan.todd@cyldeco.us
CLYDE & CO US LLP
7251 W. Lake Mead Blvd., Suite 430
Las Vegas NV 89128
Telephone: 725-248-2900
Facsimile: 725-248-2907

Attorneys for Plaintiff
Safeco Insurance Company Of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SAFECO INSURANCE COMPANY OF
AMERICA,

Plaintiff,

v.

JOHN JOSEPH-LOUIS JOHNSON, II, an
individual, and HONOUR LIGHT
INTERNATIONAL, INC.

Defendants.

CASE NO.: 2:23-cv-00743-JCM-NJK

**STIPULATION FOR EXTENSION OF
TIME TO FILE ANSWER TO
COMPLAINT**

(Second Request)

Plaintiff Safeco Insurance Company Of America (“Safeco”) and Defendant Honour Light International, Inc. (“HLI”) (collectively the “Parties”) hereby submit this Stipulation to Extend the Time Within Which to Answer Plaintiffs’ Complaint. The parties have stipulated to extend the response deadline to August 4, 2023.

The original deadline for HLI to respond to the Complaint was June 16, 2023. Charles Yu, owner of HLI, contacted Safeco to explain that he was having trouble securing counsel to represent HLI. Since HLI is a corporation organized under the laws of the State of Nevada, Mr. Yu is not permitted to represent HLI *in proper person* in this matter. Mr. Yu, on behalf of HLI, requested an additional 30 days to attempt to secure counsel.

On June 23, 2023 the Court granted the parties Stipulation for Extension of Time to File Answer to Complaint (First Request) [ECF 15] allowing HLI until July 21, 2023 to respond to the

1 Complaint. HLI now needs an additional two weeks from July 21, 2023 to secure counsel and
2 respond. Safeco does not object to HLI having additional time to secure counsel.

3 Excusable negligent exists in this case to grant HLI this additional time. Although the
4 formal request is being made after the deadline for HLI to answer the complaint, Safeco believes
5 that HLI has been diligent in its attempts to locate counsel. The parties have suffered no prejudice
6 to this requested extension.

7 Accordingly, Safeco Insurance Company Of America and Honour Light International, Inc.
8 respectfully request that this Court find that excusable neglect exists relating to this stipulation and
9 permit Honour Light International, Inc. additional time to secure counsel and respond to the
10 Complaint by August 4, 2023.

11
12 Dated: July 21, 2023

13 HONOUR LIGHT INTERNATIONAL,
14 INC.

CLYDE & CO US LLP

14 /s/ Charles Yu

15 Charles Yu, Owner
16 Honour Light International, Inc.

By: /s/ Dylan Todd

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Safeco Insurance Company Of America

21
22 **ORDER**

23
24 The above Stipulation **IS SO ORDERED.**

25
26 
27 UNITED STATES MAGISTRATE JUDGE

28 Dated: July 24, 2023